

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

HUI MINN LEE,)
vs.)
Plaintiff,)
vs.)
MARKET AMERICA, INC.,)
Defendant.)
Case No. 1:18-cv-1046

**DEFENDANT MARKET AMERICA, INC.'S ANSWERS TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

COMES NOW Defendant, Market America, Inc., (hereinafter "Market America" or "MA"), who after first being duly sworn and pursuant to provisions of Rules 26 and 33 of the Federal Rules of Civil Procedure and hereby responds to the Plaintiff's First Set of Interrogatories and avers:

1. Please provide the name, address and telephone number of any individual the Defendant contends has knowledge of any facts raised in either the Amended Complaint or Answer to the Amended Complaint. Please describe with specificity what that person has knowledge of.

ANSWER:

See Initial Disclosures.

2. Please provide the name, address and telephone number of any witness you intend to offer, or who may be offered, to testify at the trial of this matter. Please describe with specificity the facts the Defendant believes that witness will offer testimony.

12) Please describe and state with specificity each and every reason for the Plaintiff's separation of employment.

ANSWER:

Plaintiff was separated from her job for her repeated failure to work with her direct supervisor, perform tasks assigned to her, work with new software, adapt and change her work, failure to properly complete her training sessions as requested, and failure to be a team player.

13) Please identify by job title each and every position that was open and available at the time of, or within three (3) months after, the Plaintiff's termination.

ANSWER:

OBJECTION. MA objects to this interrogatory as it is overly broad and not relevant. To provide all job openings not within Ms. Lee's skill set or location would not be relevant to this case.

Without waiving the foregoing, the following positions were available during the time period requested:

Project Manager	Social Media	Product Information Specialist
Corporate Controller	Community Manager	Copy Writer - Asia Markets
Blog Manager	Beauty and Cosmetics	2nd Shift Accounts Representative
Blog Manager	Mobile Applications	Accounts Service Rep Bilingual
Copywriter - Asia	Architect	Mandarin
Markets	Web Analyst	Business Analyst - Bilingual
Senior Accountant	Intern(s) - Fall	Travel Concierge
TEST Recruiting	Semester	Purchasing Agent
Coordinator	Translator - Mandarin	Director of Field Compliance
Product Information	Mobile Applications	Unauthorized Online Sales Specialist
Specialist	Architect	Unauthorized Online Sales Specialist
Marketplace	Recruiter - Hospitality	Travel Coordinator
Operations	Service Staff	Senior Graphic Designer
Representative	Product Manager	Product Information Specilaist
Purchasing Agent	Beauty-Cosmetics	Travel Consultant
Social Media	Travel Coordinator	Vendor Account Specialist
Community Manager	Events Manager	Marketing Product Manager -
Brand and Web	Travel Consultant	Parenthood Lines
Manager	Product Manager	International Product Manager / Spain
Senior Accountant	International	and Mexico
Purchasing Agent		Copywriter
Senior Accountant		

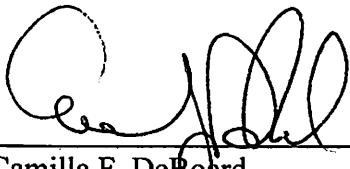
Web and Brand Manager	Administrative Assistant - Creative Services	Product Information Specialist
Marketplace Operations Representative	Administrative Assistant	Help Desk Administrator
Social Media Community Manager	Research Specialist	IT Project Manager
Health and Beauty Help Desk Administrator	HR Manager	Marketing Product Manager
Travel Coordinator	Social Media Community Manager	Health and Nutrition
Business Analyst	Beauty and Cosmetics Data Processing Representative	QA Lead
Lead QA Engineer	Travel/Events Administrative Assistant	Internet Services Product Manager
Social Media Community Manager	Business Analyst	Corporate Counsel
Events Coordinator		Director of Release Management
Events Coordinator		Test Automation Engineer
Product Manager - US/CAN		Product Information Specialist
		Copywriter
		Accounts Services Representative
		Purchasing Agent
		Python Software Engineer
		Business Analyst
		JAVA Software Engineer
		Universe Engineer
		Internet Services Product Manager
		TLS Administrator
		Merchant Content Coordinator
		Graphic Designer - Print
		Unauthorized Online Sales Specialist
		Benefits Specialist
		SEO Program Manager
		Copywriter
		Merchandising Manager

This the 13th day of October, 2020.

As to objections only:

OF COUNSEL:

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